

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

PIMPAKTRA RUST :  
: :  
PLAINTIFF, :  
: :  
vs. : CIVIL ACTION FILE  
: NO.: 7:21-cv-00105  
VINA ELISE RUST, :  
CHAKDHARI ANISSA RUST, individually :  
and as Co-Executors of the ESTATE OF :  
RICHARD C. RUST, successor in interest as :  
executor of the ESTATE OF PHILLIP G. RUST:  
JR., and THE BRYN MAWR TRUST :  
COMPANY OF DELAWARE, a limited :  
purpose trust company, in its capacity as :  
trustee of the trusts created for the benefit :  
of Richard C. Rust under agreement dated :  
July 10, 1953, as amended :  
: :  
DEFENDANTS. : :

**JOINT MOTION TO STAY PROCEEDINGS**

COME NOW Plaintiff and Defendants Vina Elise Rust and Chakdhari Anissa Rust and move the Court for an order staying these proceedings pending a settlement agreement.

In support of this motion, the parties show they participated in mediation in a separate case in North Carolina and reached a tentative settlement agreement, but several issues remain to be worked out. A final agreement would include the resolution of this lawsuit assuming that Defendant Bryn Mawr Trust Company of Delaware (“BMTC”) consents to the settlement terms and agrees to the actions necessary to consummate the settlement. Because the settlement involves obtaining the consent of BMTC, the transfer of real estate in multiple states, and the resolution of multiple lawsuits, the parties expect it will take some time to work through all of the issues. Currently pending before this Court are multiple motions. The parties have not begun discovery in

this case. As a matter of judicial economy, and in hopes of resolving this case without incurring additional fees and expenses, the parties request the Court stay the current proceedings for a period of 45 days to allow them to finalize the settlement agreement.

WHEREFORE, Plaintiff and Defendants Vina Elise Rust and Chakdhari Anissa Rust request that the Court stay proceedings and suspend all deadlines for 45 days to allow the parties to finalize a settlement agreement.

This 11<sup>th</sup> day of January, 2022.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2022 I electronically filed the foregoing *Joint Motion to Stay Proceedings* with the Clerk of Court using the CM/ECF system, which will automatically send email notifications of such filing to all attorneys for record as follows:

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